



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 13, 2021

**BY ECF**

Honorable Jed S. Rakoff  
United States District Judge  
Southern District of New York  
New York, New York 10007

**Re: *United States v. Hamid Akhavan et al., S3 20 Cr. 188 (JSR)***

Dear Judge Rakoff:

The Government writes respectfully in connection with yesterday's proceeding concerning the introduction of certain documents pertaining to the Government's enforcement priorities. (See Tr. dated Mar. 12, 2021, at 1504-1515). The parties have conferred, and agree that any party can introduce the following three documents through a summary witness: (1) Memorandum dated February 14, 2014, entitled *Guidance Regarding Marijuana Related Financial Crimes* (the "Cole Memorandum," Akhavan Ex. HA-E-8009); (2) Memorandum dated January 4, 2018, entitled *Marijuana Enforcement* (the "Sessions Memorandum," Akhavan Ex. HA-E-8013); and (3) Guidance dated February 14, 2014, entitled *BSA Expectations Regarding Marijuana-Related Businesses* (the "2014 FinCEN Guidance," Akhavan Ex. HA-E-8010). The Government otherwise reserves its rights to object to arguments the defense may wish to present to the jury arising from those documents.

Very truly yours,

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cc: all counsel of record (by ECF)